NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP)

for H. Nagel & Son Co. aka Brighton Mills in Dearborn County

Significant Source Revision No.: 029-43883-00048

The Indiana Department of Environmental Management (IDEM) has received an application from H. Nagel & Son Co. aka Brighton Mills, located at 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060, for a significant revision of its FESOP issued on October 15, 2018. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow H. Nagel & Son Co. aka Brighton Mills to make certain changes at its existing source. H. Nagel & Son Co. aka Brighton Mills has applied to construct and operate two (2) new mixing lines.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM’s preliminary findings have been sent to:

Lawrenceburg Public Library District - North Dearborn Branch
25969 Dole Road
West Harrison, IN 47060

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

This notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm). The date that this notice is posted on IDEM’s website marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.
You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will post a separate announcement of the date, time, and location of that hearing or meeting on IDEM’s website (https://www.in.gov/idem/5474.htm). At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number 029-43883-00048 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Brian Wright or (317) 234-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@idem.IN.gov

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above and will also be sent to the local library indicated above, the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Wright of my staff at the above address.

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality
Mr. John Shouse
H. Nagel & Son Co. aka Brighton Mills
707 Harrison Brookville Rd.
West Harrison, IN 47060

Re: 029-43883-00048
Significant Revision to
F029-39972-00048

Dear Mr. John Shouse:

H. Nagel & Son Co. aka Brighton Mills was issued a Federally Enforceable State Operating Permit (FESOP) No. F029-39972-00048, on October 15, 2018, for a stationary flour blending and packaging plant located at 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060. On March 12, 2021, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate two (2) new mixing lines. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

(a) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:
   (1) One (1) packer bin, identified as M3.09.
   (2) One (1) packer, identified as M3.10.
   (3) One (1) mixer, identified as M3.13.
   (4) One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

(b) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:
   (1) One (1) packer bin, identified as M4.09.
   (2) One (1) packer, identified as M4.10.
   (3) One (1) mixer, identified as M4.13.
   (4) One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

(c) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.
Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

One (1) feed-in hopper for Mixing System 4, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**Effective Date of the Permit**

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/). A copy of the application and permit is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: [http://www.in.gov/idem/](http://www.in.gov/idem/) and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [https://www.in.gov/idem/2358.htm](https://www.in.gov/idem/2358.htm); and the Citizens’ Guide to IDEM on the Internet at: [https://www.in.gov/idem/6900.htm](https://www.in.gov/idem/6900.htm).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Brian Wright, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6544 or (800) 451-6027, and ask for Brian Wright or (317) 234-6544.
Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Dearborn County
Dearborn County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office
New Source Construction and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

H. Nagel & Son Co. aka Brighton Mills
707 Harrison Brookville Road, Unit 220
West Harrison, Indiana 47060

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.
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SECTION A
SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary flour blending and packaging plant.

- Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
- General Source Phone Number: (513) 665-4550
- SIC Code: 2045 (Prepared Flour Mixes and Doughs)
- County Location: Dearborn Outside Lawrenceburg Township
- Source Location Status: Attainment for all criteria pollutants
- Source Status: Federally Enforceable State Operating Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) bulk material handling system, approved in 2018 for construction, with a maximum materials throughput rate of 46,538 tons per year, using one (1) baghouse (identified as Baghouse 1) as control, and exhausting to stack BH1, consisting of:

(1) Two (2) use bins, identified as M1.02 and M2.02.
(2) Three (3) bulk flour storage silos, identified as B1.01, B1.02, and B1.03.
(3) Two (2) airlock hoppers for the bulk flour storage silos, identified as B1.10 and B1.11.
(4) One (1) pneumatic conveying system for the two (2) airlock hoppers B1.10 and B1.11, using (1) integral cyclone (identified as B1.22).
(5) One (1) airlock hopper for the infestation destroyer, identified as B1.25.
(6) One (1) pneumatic conveying system for one (1) infestation destroyer airlock hopper, identified as B1.25, conveying to the use bins M1.02 and M2.02.

(b) One (1) mixing system, identified as Mixing System 1, approved in 2018 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 2) as control, and exhausting to stack BH2, consisting of:

(1) One (1) packer bin, identified as M1.09.
(2) One (1) packer, identified as M1.10.
(3) One (1) mixer, identified as M1.13.
(4) One (1) pneumatic conveying system for the mixer M1.13, using (1) integral cyclone (identified as M1.15).

(c) One (1) mixing system, identified as Mixing System 2, approved in 2018 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 3) as control, and exhausting to stack BH3, consisting of:

(1) One (1) packer bin, identified as M2.09.

(2) One (1) packer, identified as M2.10.

(3) One (1) mixer, identified as M2.13.

(4) One (1) pneumatic conveying system for the mixer M2.13 and the bulk bag loader M2.18, using (1) integral cyclone (identified as M2.15).

(d) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:

(1) One (1) packer bin, identified as M3.09.

(2) One (1) packer, identified as M3.10.

(3) One (1) mixer, identified as M3.13.

(4) One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

(e) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:

(1) One (1) packer bin, identified as M4.09.

(2) One (1) packer, identified as M4.10.

(3) One (1) mixer, identified as M4.13.

(4) One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)|[326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following specifically regulated insignificant activities:

(a) Waste material bins for the bulk material handling system, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 1, with a maximum capacity of 79.76 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(b) One (1) feed-in hopper for Mixing System 1, approved in 2018 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.
(c) Waste material bins for Mixing System 1, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 2, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(d) One (1) feed-in hopper for Mixing System 2, approved in 2018 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(e) Waste material bins for Mixing System 2, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(f) One (1) bulk bag loader, approved in 2018 for construction, with a maximum capacity of 5,250 pounds of flour per hour, using a cotton sock as control, and exhausting to the indoors.

(g) Waste material bins for the bulk bag loader, approved in 2018 for construction, consisting of barrels or bins used to collect dust and metal from the metal detector attached to the bulk bag loader, with a maximum capacity of 5,250 pounds of flour per hour, uncontrolled, and exhausting to the indoors.

(h) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(i) Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(j) One (1) feed-in hopper for Mixing System 4, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(k) Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(l) Two (2) natural gas-fired space heaters, identified as Heaters 1 and 2, approved in 2018 for construction, with a maximum heat input capacity of 1.2 MMBtu per hour, each, uncontrolled, and exhausting indoors.

(m) Paved roads.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]
This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
(a) This permit, F029-39972-00048, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
B.7 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
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(c) The annual compliance certification report shall include the following:

1. The appropriate identification of each term or condition of this permit that is the basis of the certification;

2. The compliance status;

3. Whether compliance was continuous or intermittent;

4. The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

5. Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

1. Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

2. A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM,
OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:
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(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F029-39972-00048 and issued pursuant to permitting programs approved into the state implementation plan have been either:
(1) incorporated as originally stated,
(2) revised, or
(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.
(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:
(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee’s premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]
The purpose of this permit is to limit this source’s potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source’s potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.7 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than 180 days from the date on which this source commences operation.
The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.
C.14  Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15  General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16  General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to
an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) bulk material handling system, approved in 2018 for construction, with a maximum materials throughput rate of 46,538 tons per year, using one (1) baghouse (identified as Baghouse 1) as control, and exhausting to stack BH1, consisting of:

1. Two (2) use bins, identified as M1.02 and M2.02.
2. Three (3) bulk flour storage silos, identified as B1.01, B1.02, and B1.03.
3. Two (2) airlock hoppers for the bulk flour storage silos, identified as B1.10 and B1.11.
4. One (1) pneumatic conveying system for the two (2) airlock hoppers B1.10 and B1.11, using (1) integral cyclone (identified as B1.22).
5. One (1) airlock hopper for the infestation destroyer, identified as B1.25.
6. One (1) pneumatic conveying system for one (1) infestation destroyer airlock hopper, identified as B1.25, conveying to the use bins M1.02 and M2.02.

(b) One (1) mixing system, identified as Mixing System 1, approved in 2018 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 2) as control, and exhausting to stack BH2, consisting of:

1. One (1) packer bin, identified as M1.09.
2. One (1) packer, identified as M1.10.
3. One (1) mixer, identified as M1.13.
4. One (1) pneumatic conveying system for the mixer M1.13, using (1) integral cyclone (identified as M1.15).

(c) One (1) mixing system, identified as Mixing System 2, approved in 2018 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 3) as control, and exhausting to stack BH3, consisting of:

1. One (1) packer bin, identified as M2.09.
2. One (1) packer, identified as M2.10.
3. One (1) mixer, identified as M2.13.
4. One (1) pneumatic conveying system for the mixer M2.13 and the bulk bag loader M2.18, using (1) integral cyclone (identified as M2.15).

(d) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:

1. One (1) packer bin, identified as M3.09.
2. One (1) packer, identified as M3.10.
(3) One (1) mixer, identified as M3.13.

(4) One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

(e) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:

(1) One (1) packer bin, identified as M4.09.

(2) One (1) packer, identified as M4.10.

(3) One (1) mixer, identified as M4.13.

(4) One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

Specifically Regulated Insignificant Activities:

(a) Waste material bins for the bulk material handling system, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 1, with a maximum capacity of 79.76 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(b) One (1) feed-in hopper for Mixing System 1, approved in 2018 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(c) Waste material bins for Mixing System 1, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 2, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(d) One (1) feed-in hopper for Mixing System 2, approved in 2018 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(e) Waste material bins for Mixing System 2, approved in 2018 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(f) One (1) bulk bag loader, approved in 2018 for construction, with a maximum capacity of 5,250 pounds of flour per hour, using a cotton sock as control, and exhausting to the indoors.

(g) Waste material bins for the bulk bag loader, approved in 2018 for construction, consisting of barrels or bins used to collect dust and metal from the metal detector attached to the bulk bag loader, with a maximum capacity of 5,250 pounds of flour per hour, uncontrolled, and exhausting to the indoors.

(h) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(i) Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.
(j) One (1) feed-in hopper for Mixing System 4, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(k) Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

1. The PM emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 195.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

1. The PM10 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

2. The PM2.5 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, Mixing System 4, waste material bins, feed-in hoppers, and bulk bag loader shall each not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, and D.1.3, the baghouses and cyclones for particulate control shall be in operation and control emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 at all times the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

(a) Visible emission notations of the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 stack exhausts (BH1, BH2, BH3, BH4, and BH5) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
Bag failure can be indicated by a significant drop in the baghouse’s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.8 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the visible emission notations of the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Specifically Regulated Insignificant Activities:

(h) Two (2) natural gas-fired space heaters, identified as Heaters 1 and 2, approved in 2018 for construction, with a maximum heat input capacity of 1.2 MMBtu per hour, each, uncontrolled, and exhausting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the two (2) natural gas-fired space heaters shall each not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.
Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)__________________________________________________
☐ Affidavit (specify)___________________________________________________
☐ Other (specify)_______________________________________________________

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: __________________________________________________________________________
Printed Name: _______________________________________________________________________
Title/Position: ______________________________________________________________________
Date: _______________________________________________________________________________
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048

This form consists of 2 pages

| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

- This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

If any of the following are not applicable, mark N/A
### Emergency Report Details

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<td>Date/Time Emergency was corrected:</td>
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<td>Was the facility being properly operated at the time of the emergency?</td>
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<tr>
<td>Describe:</td>
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</tr>
<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other:</td>
<td></td>
</tr>
<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
<td></td>
</tr>
<tr>
<td>Describe the steps taken to mitigate the problem:</td>
<td></td>
</tr>
<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
</tr>
<tr>
<td>If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:</td>
<td></td>
</tr>
</tbody>
</table>

**Form Completed by:**

**Title / Position:**

**Date:**

**Phone:**
Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048
Facility: Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4
Parameter: PM Emissions
Limit: The PM emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 195.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>QUARTER</th>
<th>YEAR</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
</tr>
<tr>
<td></td>
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<td></td>
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</tr>
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<td></td>
</tr>
</tbody>
</table>

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
  Deviation has been reported on: ___________________________

Submitted by: _________________________________________
Title / Position: _________________________________________
Signature: _________________________________________
Date: _________________________________________
Phone: _________________________________________
Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048
Facility: Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4
Parameter: PM10 Emissions
Limit: The PM10 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: ___________ YEAR: ______________________

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 1 + Column 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month (tons)</td>
<td>Previous 11 Months (tons)</td>
<td>12 Month Total (tons)</td>
<td></td>
</tr>
<tr>
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<td></td>
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</tr>
</tbody>
</table>

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
   Deviation has been reported on: _____________________________

Submitted by: _____________________________
Title / Position: _____________________________
Signature: _____________________________
Date: _____________________________
Phone: _____________________________
Source Name: H. Nagel & Son Co. aka Brighton Mills  
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060  
FESOP Permit No.: F029-39972-00048  
Facility: Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4  
Parameter: PM2.5 Emissions  
Limit: The PM2.5 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

<table>
<thead>
<tr>
<th>Month</th>
<th>Column 1 (tons)</th>
<th>Column 2 (tons)</th>
<th>Column 1 + Column 2 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- □ No deviation occurred in this quarter.
- □ Deviation/s occurred in this quarter.  
  Deviation has been reported on: ____________________________

Submitted by: ____________________________  
Title / Position: ____________________________  
Signature: ____________________________  
Date: ____________________________  
Phone: ____________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

<table>
<thead>
<tr>
<th>Permit Requirement (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
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</tr>
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<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
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<td>------------------------------------------------</td>
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</tr>
<tr>
<td>Date of Deviation:</td>
<td>Duration of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
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<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
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</tbody>
</table>

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<tr>
<td>Probable Cause of Deviation:</td>
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</tr>
<tr>
<td>Response Steps Taken:</td>
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<td>Number of Deviations:</td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
</tr>
</tbody>
</table>

Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
H. Nagel & Son Co. aka Brighton Mills
707 Harrison Brookville Road, Unit 220
West Harrison, Indiana 47060

Affidavit of Construction

I, __________________________, being duly sworn upon my oath, depose and say:

(Name of the Authorized Representative)

1. I live in __________________________ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of __________________________ for __________________________ (Company Name)

3. By virtue of my position with __________________________, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of __________________________ (Company Name)

4. I hereby certify that H. Nagel & Son Co. aka Brighton Mills, 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060, completed construction of the flour blending and packaging plant on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on May 4, 2018 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F029-39972-00048, Plant ID No. 029-00048 issued on __________.

5. Permittee, please cross out the following statement if it does not apply: Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature __________________________

Date __________________________

STATE OF INDIANA)
)SS
COUNTY OF __________________________

Subscribed and sworn to me, a notary public in and for __________________________ County and State of Indiana on this ______________ day of ______________, 20 ____, My Commission expires: ______________.

Signature __________________________

Name __________________________ (typed or printed)
Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>H. Nagel &amp; Son Co. aka Brighton Mills</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060</td>
</tr>
<tr>
<td>County:</td>
<td>Dearborn Outside Lawrenceburg Township</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>2045 (Prepared Flour Mixes and Doughs)</td>
</tr>
<tr>
<td>Operation Permit No.:</td>
<td>F029-39972-00048</td>
</tr>
<tr>
<td>Operation Permit Issuance Date:</td>
<td>October 15, 2018</td>
</tr>
<tr>
<td>Significant Permit Revision No.:</td>
<td>029-43883-00048</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Brian Wright</td>
</tr>
</tbody>
</table>

Existing Approvals

The source was issued FESOP No. F029-39972-00048 on October 15, 2018. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Dearborn County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Cannot be classified.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Attainment effective April 7, 2017, for the 2008 8-hour ozone standard for Lawrenceburg Township. Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Dearborn County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Other Criteria Pollutants
Dearborn County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
<th>PM₁</th>
<th>PM₁₀¹</th>
<th>PM₂.₅¹,²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>237.80</td>
<td>95.69</td>
<td>95.18</td>
<td>0.01</td>
<td>1.03</td>
<td>0.06</td>
<td>0.87</td>
<td>0.02 (Hexane)</td>
<td>0.02</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of FESOP NSC No. F029-39972-00048, issued on October 15, 2018.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by H. Nagel & Son Co. aka Brighton Mills on March 12, 2021, relating to the construction and operation of two (2) new mixing lines.

The following is a list of the new and modified emission units and pollution control device(s):

(b) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:

1. One (1) packer bin, identified as M3.09.
2. One (1) packer, identified as M3.10.
3. One (1) mixer, identified as M3.13.
4. One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

(c) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:

1. One (1) packer bin, identified as M4.09.
2. One (1) packer, identified as M4.10.
3. One (1) mixer, identified as M4.13.
4. One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

(d) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(e) Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(f) One (1) feed-in hopper for Mixing System 4 approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(g) Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.
“Integral Part of the Process” Determination

H. Nagel & Son Co. aka Brighton Mills has submitted the following justification for considering the pneumatic conveying systems' cyclones, identified as M3.15 and M4.15, as integral parts of the two (2) mixing systems. The cyclones are used to collect product.

(a) Each cyclone will be exclusively used for product recovery from the pneumatic conveyance systems and each cyclone will be connected to a baghouse for particulate control.

(b) The cyclones have an overwhelming positive net economic effect. The applicant has submitted the following cost saving analysis:

The annualized initial capital costs are determined by dividing the initial capital costs, which include equipment and installation, by the anticipated life span of the control equipment in years. The estimated initial capital costs of $7,448 divided by the expected seven (7) years to capitalize the cyclones give annualized initial capital costs of $1,064 per year.

The annualized actual operating costs, which include maintenance and labor, of the control devices based on anticipated actual operation are estimated at $760 per year.

The annualized initial capital costs plus the annualized actual operating costs ($1,064 per year + $760 per year) equals total annualized costs of $1,824 per year.

The value of the product recovered from the control equipment is currently estimated at $320 per ton. The combined anticipated actual amount of product recovered from the two (2) cyclones for the two (2) mixing systems is 20,956 tons per year. The total value of the recovered product is determined by multiplying the value of the product by the anticipated actual amount of product recovered or recycled.

$320 per ton * 20,956 tons/year = $6,705,920 per year

The total value of the recovered product is $6,705,920 per year for the two (2) mixing systems, combined; the total annualized costs of the cyclones are $1,824 per year. Therefore, there is an overwhelming positive net economic effect for use of the cyclones to route product to the downstream milling equipment.

(c) The cyclones would be installed if no air quality regulations were in place based on the financial incentive to operate the dust collectors.

IDEM, OAQ Determination

IDEM, OAQ has evaluated the information submitted by the applicant and agrees that each of the two (2) proposed cyclones should be considered process equipment (i.e., integral to the process) since each cyclone will be exclusively used for product recovery and serves a primary purpose other than pollution control, and there is an overwhelming positive net economic effect. The annual cost savings is significant enough to ensure that the source would operate the cyclones even if no air quality regulations were in place.

Therefore, the potential particulate emissions from the two (2) proposed mixing systems were calculated after consideration of the cyclones for purposes of determining permitting level, 326 IAC 6.5, 326 IAC 6-3, and Prevention of Significant Deterioration (PSD) applicability. Operating conditions in the proposed permit will specify that the cyclones shall operate at all times when the bulk material handling system and two mixing systems are each in operation.
Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – FESOP Significant Permit Revision

There are no new emission units or modifications to existing emission units (i.e., no physical change or change in the method of operation occurring at the source) as a result of this revision. See the "Description of Proposed Revision" section above for more detail.

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}\textsuperscript{1}</th>
<th>SO\textsubscript{2}</th>
<th>NO\textsubscript{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP\textsuperscript{2}</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixing System 3</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mixing System 4</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Hoppers and Waste Material Bins (after integral controls)</td>
<td>0.27</td>
<td>0.15</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total PTE Before Controls of the New Emission Units:</strong></td>
<td><strong>131.67</strong></td>
<td><strong>131.55</strong></td>
<td><strong>131.43</strong></td>
<td><strong>-</strong></td>
<td><strong>-</strong></td>
<td><strong>-</strong></td>
<td><strong>-</strong></td>
<td><strong>-</strong></td>
<td><strong>-</strong></td>
</tr>
</tbody>
</table>

\textsuperscript{1}PM\textsubscript{2.5} listed is direct PM\textsubscript{2.5}.

\textsuperscript{2}Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units in involves a change in operation, where the potential to emit of any pollutant increases as indicated below with potential to emit equal to or greater than twenty-five (25) tons per year of PM, PM\textsubscript{10}, and direct PM\textsubscript{2.5}, each.

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the revision of existing FESOP limits and creation of a new PSD limit.
The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM(^1)</th>
<th>PM(_{10})^1</th>
<th>PM(_{2.5})^1, 2</th>
<th>SO(_2)</th>
<th>NO(_X)</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP(^3)</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives*</td>
<td>201.67</td>
<td>95.84</td>
<td>95.21</td>
<td>0.01</td>
<td>1.03</td>
<td>0.06</td>
<td>0.87</td>
<td>0.02 Hexane</td>
<td>0.02</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
<td></td>
</tr>
</tbody>
</table>

\(^1\)Under the Part 70 Permit program (40 CFR 70), PM\(_{10}\) and PM\(_{2.5}\), not particulate matter (PM), are each considered as a "regulated air pollutant."

\(^2\)PM\(_{2.5}\) listed is direct PM\(_{2.5}\).

\(^3\)Single highest source-wide HAP

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM, PM\(_{10}\), and PM\(_{2.5}\) limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit regulated air pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Grain Elevators, 40 CFR 60, Subpart DD (326 IAC 12), are not included in the permit for this source, since although this source was constructed after August 3, 1978, it is not a grain terminal elevator or grain storage elevator as defined in §60.301. This source is a flour blending and packaging plant.
(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources: Prepared Feeds Manufacturing, 40 CFR 63, Subpart DDDDDDD are not included in the permit for this source, since although this source is an area source of HAPs as defined in §63.2, it is not a prepared feeds manufacturing facility as defined in §63.11627. This source is a flour blending and packaging plant.

(d) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

Due to this revision, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

PSD Minor Source
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) The PM emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 195.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.
FESOP PM10 and PM2.5 Limit(s)
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) The PM10 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The PM2.5 emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source (located in Dearborn County) is located in one of the counties listed in 326 IAC 6.5, but is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.5-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Dearborn County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

<table>
<thead>
<tr>
<th>State Rule Applicability – Individual Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Due to the proposed revision, state rule applicability has been reviewed as follows:</td>
</tr>
</tbody>
</table>
Permit Reviewer: Brian Wright

326 IAC 6.5 (PM Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Mixing System 3, Mixing System 4, feed-in hoppers, and waste material bins shall each not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

### Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

(1) In order to comply with the permit, the baghouses and cyclones for particulate control shall be in operation and control emissions from the Mixing System 3 and Mixing System 4 at all times the associated systems are in operation.

(2) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Testing Requirements:**

(1) IDEM OAQ has determined that testing of the two (2) new mixing lines is not required at this time to determine compliance with the PM, PM10, and PM2.5 emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Emission Unit &amp; Control Device</th>
<th>Parameter</th>
<th>Frequency</th>
<th>Range</th>
<th>Excursions and Exceedances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixing System 3, with Baghouse 4, exhausting to stack BH4</td>
<td>Visible Emissions</td>
<td>Once per day</td>
<td>normal/abnormal</td>
<td>Response Steps</td>
</tr>
<tr>
<td>Mixing System 4, with Baghouse 3, exhausting to stack BH3</td>
<td>Visible Emissions</td>
<td>Once per day</td>
<td>normal/abnormal</td>
<td>Response Steps</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the baghouses for the Mixing System 3 and Mixing System 4 must operate properly to assure compliance with 326 IAC (2-2), 326 IAC 2-8 (FESOP), and 326 IAC 6.5 (Particulate Emissions Except Lake County).

### Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as **strikethrough** text and new language appears as **bold** text:

(1) Sections A.2 and A.3 have been modified as follows in order to incorporate the new units:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:
(d) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:

(1) One (1) packer bin, identified as M3.09.

(2) One (1) packer, identified as M3.10.

(3) One (1) mixer, identified as M3.13.

(4) One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

(e) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:

(1) One (1) packer bin, identified as M4.09.

(2) One (1) packer, identified as M4.10.

(3) One (1) mixer, identified as M4.13.

(4) One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

******

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following specifically regulated insignificant activities:

******

(h) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(i) Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

(j) One (1) feed-in hopper for Mixing System 4, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

(k) Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

******

(2) Section D.1 has been amended as follows in order to incorporate the new units and applicable requirements. The conditions have been renumbered accordingly:
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

=d) One (1) mixing system, identified as Mixing System 3, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 4) as control, and exhausting to stack BH4, consisting of:

   (1) One (1) packer bin, identified as M3.09.

   (2) One (1) packer, identified as M3.10.

   (3) One (1) mixer, identified as M3.13.

   (4) One (1) pneumatic conveying system for the mixer M3.13, using (1) integral cyclone (identified as M3.15).

e) One (1) mixing system, identified as Mixing System 4, approved in 2021 for construction, with a maximum capacity of 2.66 tons per hour, using one (1) baghouse (identified as Baghouse 5) as control, and exhausting to stack BH5, consisting of:

   (1) One (1) packer bin, identified as M4.09.

   (2) One (1) packer, identified as M4.10.

   (3) One (1) mixer, identified as M4.13.

   (4) One (1) pneumatic conveying system for the mixer M4.13 and the bulk bag loader M4.18, using (1) integral cyclone (identified as M4.15).

Specifically Regulated Insignificant Activities:

=h) One (1) feed-in hopper for Mixing System 3, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

=i) Waste material bins for Mixing System 3, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.

=j) One (1) feed-in hopper for Mixing System 4, approved in 2021 for construction, with a maximum capacity of 1,000 pounds of additional ingredients per hour, uncontrolled, and exhausting to the indoors.

=k) Waste material bins for Mixing System 4, approved in 2021 for construction, consisting of barrels or bins used to collect dust from Baghouse 3, with a maximum capacity of 14.85 pounds of dust per hour, uncontrolled, and exhausting to the indoors.
Emission Limitations and Standards [326 IAC 2-8-4(1)]

**D.1.1 Particulate Matter (PM) [326 IAC 2-2]**

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

1. The PM emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 195.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.2 FESOP Limits [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

1. The PM10 emissions from the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

2. The PM2.5 emissions from the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.3 Particulate Matter (PM) [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 waste material bins, feed-in hoppers, and bulk bag loader shall each not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

*****

**D.1.4 Particulate Control**

1. In order to comply with Conditions D.1.1, and D.1.2, and D.1.3 the baghouses and cyclones for particulate control shall be in operation and control emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 at all times the associated systems Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 are in operation.

*****
Visible Emissions Notations

(a) Visible emission notations of the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 stack exhausts (BH1, BH2, BH3, BH4, and BH5) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

*****

Record Keeping Requirements

(a) To document the compliance status with Condition D.1.56, the Permittee shall maintain daily records of the visible emission notations of the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

*****

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048
Facility: Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4
Parameter: PM Emissions
Limit: The PM emissions from the Bulk Material Handling System, Mixing System 1, Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 195.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: ___________________ YEAR: ___________________
No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: ____________________________
Title / Position: ____________________________
Signature: ____________________________
Date: ____________________________
Phone: ____________________________

FESOP Quarterly Report

Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048
Facility: Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4
Parameter: PM10 Emissions
Limit: The PM10 emissions from the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

FESOP Quarterly Report

Source Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
FESOP Permit No.: F029-39972-00048
Facility: Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4
Parameter: PM2.5 Emissions
Limit: The PM2.5 emissions from the Bulk Material Handling System, Mixing System 1, and Mixing System 2, Mixing System 3, and Mixing System 4 shall not exceed 95.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 12, 2021.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 029-43883-00048. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.
IDEM Contact

(a) If you have any questions regarding this permit, please contact Brian Wright, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6544 or (800) 451-6027, and ask for Brian Wright or (317) 234-6544.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.
### Appendix A.1: Emissions Calculations

#### Entire Source Summary

**Company Name:** H. Nagel & Son Co. aka Brighton Mills  
**Source Address:** 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060  
**Permit Number:** 029-43835-00048  
**Reviewer:** Brian Wright

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Case HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ducted/Ductable Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulk Material Handling System</td>
<td>105.12</td>
<td>105.12</td>
<td>105.12</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mining System 1</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
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<td>Mining System 2</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mining System 3</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mining System 4</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Bulk Bag Loading</td>
<td>0.70</td>
<td>0.39</td>
<td>0.07</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Waste Material Bins</td>
<td>0.29</td>
<td>0.07</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas-Fired Units</td>
<td>0.02</td>
<td>0.08</td>
<td>0.03</td>
<td>0.01</td>
<td>0.03</td>
<td>0.06</td>
<td>0.87</td>
<td>0.02</td>
<td>0.02 (Hexane)</td>
</tr>
</tbody>
</table>

**Total Unlimited/Uncontrolled Ducted/Ductable Emissions**

|   | 369.20 | 368.61 | 368.10 | 0.01 | 1.03 | 0.06 | 0.87 | 0.02 | 0.02 (Hexane) |

**Fugitive Emissions (1)**

<table>
<thead>
<tr>
<th>Type</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Case HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paved Roads</td>
<td>0.73</td>
<td>0.15</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Limited/Controlled Potential to Emit (tons/year)**

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Case HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ducted/Ductable Emissions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulk Material Handling System</td>
<td>1.05</td>
<td>1.05</td>
<td>1.05</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mixing System 1</td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mixing System 2</td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mixing System 3</td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mixing System 4</td>
<td>0.66</td>
<td>0.66</td>
<td>0.66</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Bulk Bag Loading</td>
<td>0.70</td>
<td>0.38</td>
<td>0.07</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Waste Material Bins</td>
<td>0.53</td>
<td>0.30</td>
<td>0.05</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Natural Gas-Fired Units</td>
<td>0.20</td>
<td>0.07</td>
<td>0.01</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total Limited/Controlled Ducted/Ductable Emissions**

|   | 5.21  | 4.44  | 3.81  | 0.01 | 1.03 | 0.06 | 0.87 | 0.02 | 0.02 (Hexane) |

**Fugitive Emissions (2)**

<table>
<thead>
<tr>
<th>Type</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Case HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paved Roads</td>
<td>0.73</td>
<td>0.15</td>
<td>0.04</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

**Total Fugitive Emissions**

|   | 0.73  | 0.15 | 0.04  | -   | -   | -   | -  | -          | -             |

### NA = Not Applicable.

Total emissions based on rated capacity at 8,760 hours/year.

(1) Unlimited/Uncontrolled Emissions

(2) Since this type of operation is not one of the twenty-eight (28) listed source categories under 328 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 applicability.
### Bulk Material Handling System and Mixing Systems

**Company Name:** H. Nagel & Son Co. aka Brighton Mills  
**Source Address:** 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060  
**Permit Number:** 029-43883-00048  
**Reviewer:** Brian Wright

<table>
<thead>
<tr>
<th>Emission Unit/Process</th>
<th>Control ID (1)</th>
<th>Potential Air Flow Rate of Baghouse Control (acfm)</th>
<th>Outlet Grain Loading (grain/dscf)</th>
<th>Uncontrolled PTE of PM/PM$<em>{10}$/PM$</em>{2.5}$ (lbs/hr)</th>
<th>Uncontrolled PTE of PM/PM$<em>{10}$/PM$</em>{2.5}$ (tons/yr)</th>
<th>Controlled PTE of PM/PM$<em>{10}$/PM$</em>{2.5}$ (lbs/hr)</th>
<th>Controlled PTE of PM/PM$<em>{10}$/PM$</em>{2.5}$ (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bulk Material Handling System</td>
<td>BH1</td>
<td>2,800</td>
<td>0.01</td>
<td>24.00</td>
<td>105.12</td>
<td>0.24</td>
<td>1.05</td>
</tr>
<tr>
<td>Mixing System 1</td>
<td>BH2</td>
<td>1,750</td>
<td>0.01</td>
<td>15.00</td>
<td>65.70</td>
<td>0.15</td>
<td>0.66</td>
</tr>
<tr>
<td>Mixing System 2</td>
<td>BH3</td>
<td>1,750</td>
<td>0.01</td>
<td>15.00</td>
<td>65.70</td>
<td>0.15</td>
<td>0.66</td>
</tr>
<tr>
<td>Mixing System 3</td>
<td>BH4</td>
<td>1,750</td>
<td>0.01</td>
<td>15.00</td>
<td>65.70</td>
<td>0.15</td>
<td>0.66</td>
</tr>
<tr>
<td>Mixing System 4</td>
<td>BH5</td>
<td>1,750</td>
<td>0.01</td>
<td>15.00</td>
<td>65.70</td>
<td>0.15</td>
<td>0.66</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>39.00</strong></td>
<td><strong>170.82</strong></td>
<td><strong>0.39</strong></td>
<td><strong>1.71</strong></td>
</tr>
</tbody>
</table>

**Notes**  
(1) Each baghouse has a 99.0% control efficiency.

**Methodology**  
Uncontrolled PTE of PM (lb/hr) = Controlled PTE of PM (lb/hr) / (100%-control efficiency(%)  
Uncontrolled PTE of PM (ton/yr) = Controlled PTE of PM (ton/yr) / (100%-control efficiency(%)  
Controlled PTE of PM (lbs/hr) = Air Flow Rate (acfm) * Outlet Grain Loading (gr/dscf) * 60 min/hr * 1 lb/7,000 gr  
Controlled PTE of PM (tons/yr) = Air Flow Rate (acfm) * Outlet Grain Loading (gr/dscf) * 60 min/hr * 1 lb/7,000 gr * 8,760 hrs/yr * 1 ton/2,000 lbs
### Appendix A: Emission Calculations

#### Bulk Bag Loading, Feed-In Hoppers, and Waste Material Bins

**Company Name:** H. Nagel & Son Co. aka Brighton Mills  
**Source Address:** 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060  
**Permit Number:** 029-43883-00048  
**Reviewer:** Brian Wright

<table>
<thead>
<tr>
<th>Emission Unit/Process</th>
<th>Processing Rate (tons/hour)</th>
<th>PM Emission Factors (lbs/ton)</th>
<th>PM emissions (lbs/hour)</th>
<th>PM10 Emission Factors (lbs/ton)</th>
<th>PM10 Emissions (tons/year)</th>
<th>PM2.5 Emission Factors (lbs/ton)</th>
<th>PM2.5 Emissions (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bulk Bag Loading*</td>
<td>2.63</td>
<td>0.061</td>
<td>0.16</td>
<td>0.70</td>
<td>0.034</td>
<td>0.09</td>
<td>0.39</td>
</tr>
<tr>
<td>Mixing System 1 Feed-In Hopper*</td>
<td>0.50</td>
<td>0.061</td>
<td>0.03</td>
<td>0.13</td>
<td>0.034</td>
<td>0.02</td>
<td>0.07</td>
</tr>
<tr>
<td>Mixing System 2 Feed-In Hopper*</td>
<td>0.50</td>
<td>0.061</td>
<td>0.03</td>
<td>0.13</td>
<td>0.034</td>
<td>0.02</td>
<td>0.07</td>
</tr>
<tr>
<td>Mixing System 3 Feed-In Hopper*</td>
<td>0.50</td>
<td>0.061</td>
<td>0.03</td>
<td>0.13</td>
<td>0.034</td>
<td>0.02</td>
<td>0.07</td>
</tr>
<tr>
<td>Mixing System 4 Feed-In Hopper*</td>
<td>0.50</td>
<td>0.061</td>
<td>0.03</td>
<td>0.13</td>
<td>0.034</td>
<td>0.02</td>
<td>0.07</td>
</tr>
<tr>
<td>Bulk Material Handling System Waste Material Bin*</td>
<td>0.01</td>
<td>0.025</td>
<td>0.000</td>
<td>0.001</td>
<td>0.0063</td>
<td>0.0001</td>
<td>0.000</td>
</tr>
<tr>
<td>Mixing System 1 Waste Material Bins**</td>
<td>0.01</td>
<td>0.025</td>
<td>0.0002</td>
<td>0.001</td>
<td>0.0063</td>
<td>0.00005</td>
<td>0.0002</td>
</tr>
<tr>
<td>Mixing System 2 Waste Material Bins**</td>
<td>0.01</td>
<td>0.025</td>
<td>0.0002</td>
<td>0.001</td>
<td>0.0063</td>
<td>0.00005</td>
<td>0.0002</td>
</tr>
<tr>
<td>Mixing System 3 Waste Material Bins**</td>
<td>0.01</td>
<td>0.025</td>
<td>0.0002</td>
<td>0.001</td>
<td>0.0063</td>
<td>0.00005</td>
<td>0.0002</td>
</tr>
<tr>
<td>Mixing System 4 Waste Material Bins**</td>
<td>0.01</td>
<td>0.025</td>
<td>0.0002</td>
<td>0.001</td>
<td>0.0063</td>
<td>0.00005</td>
<td>0.0002</td>
</tr>
<tr>
<td>1Bulk Bag Loading Waste Material Bins**</td>
<td>2.63</td>
<td>0.025</td>
<td>0.07</td>
<td>0.29</td>
<td>0.0063</td>
<td>0.02</td>
<td>0.07</td>
</tr>
</tbody>
</table>

**Total:** 1.53 0.76 0.13 0.15 0.15

**Total New Units:** 0.27 0.03

1 Processing Rate (tons/hour) = Maximum Capacity (tons/hr)/ 2000 lb/ton  
*Emission factors are from AP-42, Table 9.9.1-1 Headhouse and Grain Handling, SCC 3-02-005-30 (March 2003)

**Emission factors are from AP-42, Table 9.9.1-1 Storage Bin (Vent), SCC 3-02-005-40 (March 2003)

**Methodology**

PTE of PM/PM10/PM2.5 (lb/hour) = Processing rate (ton/hour) * Emission factor (lb/ton)  
PTE of PM/PM10/PM2.5 (ton/year) = Processing rate (ton/hour) * Emission factor (lb/ton) * 8760 hours/year * 1 ton/2000 lbs
Natural Gas Combustion Only

Company Name: H. Nagel & Son Co. aka Brighton Mills
Source Address: 707 Harrison Brookville Road, Unit 220, West Harrison, Indiana 47060
Permit Number: 029-43883-00048
Reviewer: Brian Wright

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.02</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.08</td>
</tr>
<tr>
<td>direct PM2.5*</td>
<td>7.6</td>
<td>0.08</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.01</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>1.03</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.06</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Hazardous Air Pollutants (HAPs)

<table>
<thead>
<tr>
<th>HAPs - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
</tr>
<tr>
<td>Emission Factor in lb/MMCF</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HAPs - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
</tr>
<tr>
<td>Emission Factor in lb/MMCF</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
</tr>
</tbody>
</table>

Methodology is the same as above.
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emission Calculations

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (tons/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/trip)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>40.0</td>
<td>200.0</td>
<td>900</td>
<td>0.170</td>
<td>0.9</td>
<td>311.1</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>5.0</td>
<td>1.0</td>
<td>5.0</td>
<td>15.0</td>
<td>75.0</td>
<td>900</td>
<td>0.170</td>
<td>0.9</td>
<td>311.1</td>
</tr>
</tbody>
</table>

| Totals | 10.0 | 2.0 | 10.0 | 55.0 | 275.0 | 1.7 | 0.340 | 1.8 | 622.2 |

Average Vehicle Weight Per Trip = 27.5 tons/trip
Average Miles Per Trip = 0.17 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02]  (Equation 1 from AP-42 13.2.1)

where: k = 0.011 (PM10), 0.0022 (PM2.5) = particle size multiplier (AP-42 Table 13.2.1-1)
W = 27.5 tons = average vehicle weight (provided by source)
sL = 9.7 g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]  (Equation 2 from AP-42 13.2.1)

where: p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

Mitigated PTE of PM10 (Before Control) = 0.07 tons/yr
Mitigated PTE of PM2.5 (Before Control) = 0.02 tons/yr

Methodology

Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (Before Control) (tons/yr) = [Mitigated PTE of PM (tons/yr)] + [Mitigated PTE of PM10 (tons/yr)] + [Mitigated PTE of PM2.5 (tons/yr)]

Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (<2.5 um)
PTE = Potential to Emit
<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Case HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mixing System 3</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>NA</td>
</tr>
<tr>
<td>Mixing System 4</td>
<td>65.70</td>
<td>65.70</td>
<td>65.70</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>NA</td>
</tr>
<tr>
<td>Hoppers and Waste Material Bins</td>
<td>0.27</td>
<td>0.15</td>
<td>0.03</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Revision Total</strong></td>
<td><strong>131.67</strong></td>
<td><strong>131.55</strong></td>
<td><strong>131.43</strong></td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
May 6, 2021

John Shouse
H Nagel & Son Company aka Brighton Mills
707 Harrison Brookville Road
West Harrison IN 47060

Re: Public Notice
H. Nagel & Son Co. aka Brighton Mills
Permit Level: FESOP Significant Permit Rev
(Minor PSD/EO) (120)
Permit Number: 029-43883-00048

Dear John Shouse:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM's online searchable database: [http://www.in.gov/apps/idem/caats/](http://www.in.gov/apps/idem/caats/) . Choose Search Option by Permit Number, then enter permit 43883

and

IDEM's Virtual File Cabinet (VFC): [https://www.IN.gov/idem](https://www.IN.gov/idem) . Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: [https://www.in.gov/idem/public-notices/](https://www.in.gov/idem/public-notices/)

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Lawrenceburg Public Library Dist-N Dearborn Branch, 25969 Dole Rd, West Harrison IN 47060. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

L. Pogost
L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
May 6, 2021

To: Lawrenceburg Public Library Dist-N Dearborn Branch 25969 Dole Rd West
Harrison IN 47060

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: H. Nagel & Son Co. aka Brighton Mills
Permit Number: 029-43883-00048

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

May 6, 2021
H. Nagel & Son Co. aka Brighton Mills
029-43883-00048

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/public-notices/.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
**Mail Code 61-53**

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<th>Line</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
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<th>R.R. Fee</th>
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<th>Remarks</th>
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<tr>
<td>1</td>
<td>John Shouse H Nagel &amp; Son Company aka Brighton Mills 707 Harrison Brookville Road West Harrison IN 47060 (Source CAATS)</td>
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<td>Whitewater Milling LLC 707 Harrison Brookville Road West Harrison IN 47060 (Affected Party)</td>
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<td>Chandra Mattingly Rising Sun Recorder 126 W High St Lawrenceburg IN 47025 (Affected Party)</td>
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<td>Michael &amp; Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)</td>
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<td>Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)</td>
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<td>Dearborn County Health Department 165 Mary St Lawrenceburg IN 47025 (Health Department)</td>
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<td>Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)</td>
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<td>Ken &amp; Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)</td>
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<td>Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)</td>
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<td>Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)</td>
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<td>12</td>
<td>West Harrison Town Council 100 Railroad Ave. West Harrison IN 47060 (Local Official)</td>
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<td>Lawrenceburg Public Library Dist-N Dearborn Branch 25969 Dole Rd West Harrison IN 47060 (Library)</td>
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<td>Thomas Tucker Apex Companies, LLC 155 Tri-County Parkway, Suite 250 Cincinnati OH 45246 (Consultant)</td>
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<td>Brenda and Clysta Hill Life Estate 9506 Galecrest Road Cincinnati OH 45231 (Affected Party)</td>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

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**Mail Code 61-53**

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<th>IDEM Staff</th>
<th>LPOGOST</th>
<th>5/6/2021</th>
<th>H Nagel &amp; Son Company aka Brighton Mills 029-43883-00048 draft/) 2 of 2</th>
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<th>Remarks</th>
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<td>Alice &amp; Alan 28046 East Drive West Harrison IN 47060 (Affected Party)</td>
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<td>Julia &amp; Charles Wilson 606 Harrison Brookville Road West Harrison IN 47060 (Affected Party)</td>
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<td>Rudicil Trust 29187 Barber Road West Harrison IN 47060 (Affected Party)</td>
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<td>John &amp; Judy Hillman 28029 Reiner Drive West Harrison IN 47060 (Affected Party)</td>
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<td>Donald &amp; Darlene Newkirk 28036 Reiner Drive West Harrison IN 47060 (Affected Party)</td>
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